



**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**[1] CHESTER GALLAGHER
[2] HEATHER IDONI
[3] CALVIN ZASTROW
[4] COLEMAN BOYD
[7] DENNIS GREEN**

**No. 3:22-CR-00327
JUDGE TRAUGER**

**MOTION REQUESTING LEAVE TO MANUALLY FILE
AUDIO/VISUAL RECORDINGS RELEVANT TO
OBJECTIONS AND PRETRIAL ISSUES**

Comes now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman Boyd, Paul Vaughn and Dennis Green, by and through undersigned counsel, and hereby move this Honorable Court for permission to manually file a flash drive containing five audio/visual recordings of the March 5, 2021 incident.

In support of this Motion, undersigned counsel submit the following:

1. The Government has provided a list of approximately seventy-one recording clips and has indicated that it intends to introduce the majority of the clips at trial during the government's case-in-chief (see attached video clip list, Exhibit A); the Government is still in the process of deciding which of the listed clips they intend to introduce at trial. The video clips are from five different videos.